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February 16, 2022

The Honorable John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

RE: Hager-Reilly v. SCO Family of Services, 21-cv-11023-JGK

Dear Judge Koeltl:

I represent the Plaintiff in the above referenced matter before your honor. Plaintiff respectfully submits this letter motion for non-dispositive relief.

Plaintiff respectfully requests that your honor compel that Defendant conform their requests to the court to an appropriate form. Simple communication by letter is not such an appropriate form. Fed. R. Civ. P. 7(b)(1); e.g. 7-Eleven, Inc. v. Khan, No. 3:15-cv-01011 (JAM), at \*7 (D. Conn. Jan. 19, 2016).

Defendant sent your honor a letter yesterday on ECF (Docket No. 14) requesting relief, namely "to respectfully request that the Court "so order" the proposed Protective Order."

While the Plaintiff does not oppose the requested relief such relief cannot be requested by simple letter. Fed. R. Civ. P. 7(b)(1).

While the undersigned does detest being so "nit picky," in general a request for a court order must be made by motion. *Id.* Defendant's letter does not conform to this rule. 7-Eleven, Inc. v. Khan, No. 3:15-cv-01011 (JAM), at \*7 (D. Conn. Jan. 19, 2016) ("It is a basic rule of civil procedure that "[a] request for a court order must be made by motion," Fed. R. Civ. P. 7(b)(1)").

Thank you for your attention to this letter. If there is any way I may assist your honor in determining Plaintiff's requested relief, please do let me know.

Kind regards,

/s/Kareem E. Abdo

Kareem E. Abdo, Esq.

CC: Ana C. Shields, Esq.  
Isaac S. Baskin, Esq.

*Application denied.  
see local Rule 7.1 (d),  
so ordered. grb/Koeltl  
2/16/22 J.S.D.S.*